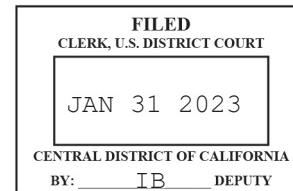


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8 Attorneys for Plaintiff
9 UNITED STATES OF AMERICA

10 UNITED STATES DISTRICT COURT

11 FOR THE CENTRAL DISTRICT OF CALIFORNIA

12 UNITED STATES OF AMERICA,

EDCR 5:23-cr-00021-JGB

13 Plaintiff,

GOVERNMENT'S EX PARTE APPLICATION
FOR ORDER SEALING INDICTMENT AND
RELATED DOCUMENTS; DECLARATION OF
VALERIE L. MAKAREWICZ

14 v.

15 JASON EDWARD THOMAS CARDIFF,

(UNDER SEAL)

16 Defendant.

17
18 The government hereby applies ex parte for an order that the
19 indictment and any related documents in the above-titled case (except
20 the arrest warrants for the charged defendants) be kept under seal
21 until the government files a "Report Commencing Criminal Action" in
22 this matter.

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This ex parte application is made pursuant to Federal Rule of Criminal Procedure 6(e)(4) and is based on the attached declaration of AUSA Valerie L. Makarewicz.

Dated: January 28, 2023

Respectfully submitted,

E. MARTIN ESTRADA
United States Attorney

MACK E. JENKINS
Assistant United States Attorney
Chief, Criminal Division

Vaihle

VALERIE L. MAKAREWICZ
Assistant United States Attorney

Attorneys for Plaintiff
UNITED STATES OF AMERICA

1 **DECLARATION OF VALERIE L. MAKAREWICZ**

2 I, VALERIE L. MAKAREWICZ, declare as follows:

3 1. I am an Assistant United States Attorney in the United
4 States Attorney's Office for the Central District of California. I
5 represent the government in the prosecution of United States v. JASON
6 EDWARD THOMAS CARDIFF, No. Enter Case No., the indictment in which is
7 being presented to a federal grand jury in the Central District of
8 California on January 31, 2023.

9 2. Defendant has not been taken into custody on the charges
10 contained in the indictment and has not been informed that he is
11 being named as a defendant in the indictment to be presented to the
12 grand jury on January 27, 2023. Based on the investigation to date,
13 defendant is currently living in Europe. The likelihood of
14 apprehending defendant might jeopardized if the indictment in this
15 case were made publicly available before defendant is taken into
16 custody on the indictment.

17 3. Accordingly, the government requests that the indictment
18 and sealed documents in this case (except the arrest warrants) be
19 sealed and remain so until one of the defendants is taken into
20 custody on the charges contained in the indictment and the government
21 files a "Report Commencing Criminal Action" in this matter. In
22 addition, the government requests that the indictment and arrest
23 warrant be unsealed only so the government can provide the documents
24 to INTERPOL, so it may post a "Red Notice" regarding defendant, since
25 I believe defendant does not live in the United States at this time.

26 4. I declare under penalty of perjury under the laws of the
27 United States of America that the foregoing is true and correct and
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1 that this declaration is executed at Los Angeles, California, on
2 January 28, 2023.

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5 VALERIE L. MAKAREWICZ
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